EXHIBIT B

Page 1

1	SUPREME COURT OF THE STATE OF NEW YORK
2	COUNTY OF NEW YORK
	X
3	JOBAR HOLDING CORPORATION, ROBERT BUCK,
	INDIVIDUALLY, AND ROBERT BUCK, AS EXECUTOR
4	OF THE ESTATE OF JOAN BUCK, AND ROBERT
	BUCK, INDIVIDUALLY, AND ROBERT BUCK AS
5	EXECUTOR OF THE ESTATE OF JOAN BUCK,
	DERIVATIVELY AS SHAREHOLDER ON BEHALF OF
6	JOBAR HOLDING CORPORATION,
7	Plaintiffs,
8	Index No.:
	655689/2017
9	-against-
10	BARBARA HALIO,
11	Defendants.
	x
12	_
	DATE: January 19, 2023
13	
	TIME: 10:00 a.m.
14	
15	
16	DEPOSITION of DAVID HALIO, a
17	NON-PARTY WITNESS, taken by the Plaintiff,
18	pursuant Subpoena, held at the Offices of
L9	Scarinci Hollenbeck, 589 8th Avenue, 16th
20	floor, New York, New York 10018, at
21	above-mentioned date and time, before
22	MARINA DUBSON, a Notary Public of the State
23	of New York.
24	
25	

	*		
1	D. Halio	12.11	Page 68
2	Q. Would you read the April 25th	1 2	D. Halio
3	entry, please.	3	question.
4	MR. WEISS: The typewritten		Q. This says Jobar sent that
5	entry'?	4	amount, and you say you paid that amount.
6		5	Wouldn't that be paying it twice?
7	Q. Yeah, the second entry. A. It says: Johan Holding account	6	MR. WEISS: Objection.
8	and a south Holding account	7	You can answer.
9	used by Barbara Halio to pay	8	 A. It wasn't paid twice.
10	Q. No, no, not that. Not the	9	MR. BRECHER: Well, I call for
	handwriting. Ignore the handwriting. Just	10	the production of your payment to
11	the typewritten, I'm sorry.	11	your medical malpractice insurer of
12	A. Which one?	12	that amount in that year, in 2013.
13	Q. April 25th.	13	(Request noted.)
14	A. Where's April 25th?	14	MR. WEISS: Take it under
15	Q. It's the second entry.	15	advisement.
16	A. It says: Debt to Citibank.	16	
17	Medical liability insurance, David A.	17	
18	Halio, MD.	18	never lent you any money to pay your
19	Q. What is the amount?	19	medical malpractice insurance?
20	A. 43,995.	20	MR. WEISS: Objection.
21	Q. And was that amount, to your	21	Q. Is that your testimony?
22	knowledge, paid to your insurer?	22	MR. WEISS: Can you just ask a
23	A. I write my own checks to the		question?
24	insurance company.	23	Q. Did Jobar Holding Corporation
25		24	ever pay any of your medical malpractice
	Q. So you never had Jobar pay your	25	insurance?
,	Page 6	7	Page 69
1	D. Halio	1	D. Halio
2	medical liability insurance?	2	A. I don't recall.
2	A 71	-	A. I don't recall,
3	 A. They never paid my medical 	3	
4	A. They never paid my medical liability insurance.		Q. Did you ever repay Jobar for
4 5	A. They never paid my medical liability insurance. Q. And they never sent any money	3	
4 5 6	 A. They never paid my medical liability insurance. Q. And they never sent any money to your insurer? 	3	Q. Did you ever repay Jobar for paying your medical malpractice insurance?A. No.
4 5 6 7	A. They never paid my medical liability insurance. Q. And they never sent any money to your insurer? A. I would have to look at the	3 4 5	 Q. Did you ever repay Jobar for paying your medical malpractice insurance? A. No. Q. Did you ever tell anyone that
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4 5 6 7 8 9	A. They never paid my medical liability insurance. Q. And they never sent any money to your insurer? A. I would have to look at the check, I don't recall. Q. Well, it's not a check. This is a bank transfer.	3 4 5 6 7 8	 Q. Did you ever repay Jobar for paying your medical malpractice insurance? A. No. Q. Did you ever tell anyone that you repaid Jobar for paying your medical malpractice insurance? A. No.
4 5 6 7 8 9 10 11	A. They never paid my medical liability insurance. Q. And they never sent any money to your insurer? A. I would have to look at the check, I don't recall. Q. Well, it's not a check. This is a bank transfer. MR. WEISS: What's the	3 4 5 6 7 8 9	 Q. Did you ever repay Jobar for paying your medical malpractice insurance? A. No. Q. Did you ever tell anyone that you repaid Jobar for paying your medical malpractice insurance? A. No. Q. Has anyone ever asked you
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18 (Pages 66 - 69)

,	Page 7)	Page 72
1	D. Halio	1	D. Halio
2	MR. WEISS: Are you looking for	2	 Q. Did anyone tell you they had
	616 or 578?	3	sent \$60,000 to you?
4	MR. BRECHER: I have 578. I	4	A. No.
5	don't have 616.	5	Q. All right. Turn back to 578.
6	MR. RICE: Just let us know	6	There is a Jobar Production 578 for the
8	which one you're	7	period May 2013 through May 31, 2013. And
9	MR. BRECHER: 616.	8	you see the second entry, again, May 3rd to
10	Q. The entry for November 22nd	9	Checking Account 7165. Is that your
11	says: Transfer to 7165. You also stated that's your account, right?	10	account?
12	A. Yes.	11	A. Yes, it is.
13		12	Q. And it's for \$50,000, correct?
14	- mailioidi, cita	13	A. Yes, it is.
15	you ever receive a check for \$15,000 s	14	Q. Do you recall receiving that
16	you ever receive a check for \$15,000 from Jobar in that period?	15	amount in a wire transfer on May 3rd, 2013?
17	A. I don't recall.	16	A. I don't recall.
18	Q. Did you ever receive a wire	17	Q. Did anyone tell you that they
19	transfer during that period for \$15,000?	18	had sent you a wire transfer of that
20	A. I don't recall.	19	amount?
21	Q. Apparently I misspoke. It's a	20	A. No.
22	wire transfer, not a check.	21	Q. Did you ever ask for it?
23	Turn to next page, Johar 618	22	A. No.
24	for the period November 30th, 2013, through	23	Q. Turn to the Check Number 1091
25	December 31, 2013. Do you have that, 618?	24 25	for \$50,000 dated October 21, 2012, from
		23	Jobar Holding Corp. in the amount of
1	D. Halio	,	Page 73
2			
2		1	D. Halio
3	MR. RICE: That's the fourth	2	\$50,000. Did you receive that check?
3	MR. RICE: That's the fourth page. Are we skipping page 578?	2	\$50,000. Did you receive that check? A. Yes.
3	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment.	2 3 4	\$50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in
3	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay.	2 3 4 5	\$50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165?
3 4 5 6 7	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment.	2 3 4 5 6	\$50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall.
3 4 5 6 7 8	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay. Q. Do you see that's another wire	2 3 4 5 6 7	\$50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall. Q. You see the back of the check
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay. Q. Do you see that's another wire transfer? MR. WEISS: Just so we're clear, we're on 618, correct? Q. 618, second entry, December 20th, 2013, a wire transfer again to Checking Account 7165. That's your account, correct? A. It is. Q. And it's for \$60,000, correct? A. Which one is that? Q. The second entry. The one at 12/20. A. Correct. Q. And did you receive that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	S50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall. Q. You see the back of the check below it? A. Yes. Q. Is that your handwriting? A. Yes. Q. Do you recall signing this check and depositing it into your account? A. I don't recall. I don't remember. Q. Do you have any reason to doubt that you deposited it in your account? A. No.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay. Q. Do you see that's another wire transfer? MR. WEISS: Just so we're clear, we're on 618, correct? Q. 618, second entry, December 20th, 2013, a wire transfer again to Checking Account 7165. That's your account, correct? A. It is. Q. And it's for \$60,000, correct? A. Which one is that? Q. The second entry. The one at 12/20. A. Correct. Q. And did you receive that amount?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	S50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall. Q. You see the back of the check below it? A. Yes. Q. Is that your handwriting? A. Yes. Q. Do you recall signing this check and depositing it into your account? A. I don't recall. I don't remember. Q. Do you have any reason to doubt that you deposited it in your account? A. No. Q. You see the check says loan, correct? A. Yes.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay. Q. Do you see that's another wire transfer? MR. WEISS: Just so we're clear, we're on 618, correct? Q. 618, second entry, December 20th, 2013, a wire transfer again to Checking Account 7165. That's your account, correct? A. It is. Q. And it's for \$60,000, correct? A. Which one is that? Q. The second entry. The one at 12/20. A. Correct. Q. And did you receive that amount? A. I don't recall.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	S50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall. Q. You see the back of the check below it? A. Yes. Q. Is that your handwriting? A. Yes. Q. Do you recall signing this check and depositing it into your account? A. I don't recall. I don't remember. Q. Do you have any reason to doubt that you deposited it in your account? A. No. Q. You see the check says loan, correct? A. Yes. Q. Was this a loan to you of
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay. Q. Do you see that's another wire transfer? MR. WEISS: Just so we're clear, we're on 618, correct? Q. 618, second entry, December 20th, 2013, a wire transfer again to Checking Account 7165. That's your account, correct? A. It is. Q. And it's for \$60,000, correct? A. Which one is that? Q. The second entry. The one at 12/20. A. Correct. Q. And did you receive that amount? A. I don't recall. Q. Did you ask anyone to send you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	S50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall. Q. You see the back of the check below it? A. Yes. Q. Is that your handwriting? A. Yes. Q. Do you recall signing this check and depositing it into your account? A. I don't recall. I don't remember. Q. Do you have any reason to doubt that you deposited it in your account? A. No. Q. You see the check says loan, correct? A. Yes. Q. Was this a loan to you of S50,000?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay. Q. Do you see that's another wire transfer? MR. WEISS: Just so we're clear, we're on 618, correct? Q. 618, second entry, December 20th, 2013, a wire transfer again to Checking Account 7165. That's your account, correct? A. It is. Q. And it's for \$60,000, correct? A. Which one is that? Q. The second entry. The one at 12/20. A. Correct. Q. And did you receive that amount? A. I don't recall. Q. Did you ask anyone to send you \$60,000 from Jobar?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	S50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall. Q. You see the back of the check below it? A. Yes. Q. Is that your handwriting? A. Yes. Q. Do you recall signing this check and depositing it into your account? A. I don't recall. I don't remember. Q. Do you have any reason to doubt that you deposited it in your account? A. No. Q. You see the check says loan, correct? A. Yes. Q. Was this a loan to you of \$50,000? A. That's what the check says.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. RICE: That's the fourth page. Are we skipping page 578? MR. BRECHER: For the moment. MR. WEISS: Okay. Q. Do you see that's another wire transfer? MR. WEISS: Just so we're clear, we're on 618, correct? Q. 618, second entry, December 20th, 2013, a wire transfer again to Checking Account 7165. That's your account, correct? A. It is. Q. And it's for \$60,000, correct? A. Which one is that? Q. The second entry. The one at 12/20. A. Correct. Q. And did you receive that amount? A. I don't recall. Q. Did you ask anyone to send you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	S50,000. Did you receive that check? A. Yes. Q. Did you deposit that check in your account 7165? A. I don't recall. Q. You see the back of the check below it? A. Yes. Q. Is that your handwriting? A. Yes. Q. Do you recall signing this check and depositing it into your account? A. I don't recall. I don't remember. Q. Do you have any reason to doubt that you deposited it in your account? A. No. Q. You see the check says loan, correct? A. Yes. Q. Was this a loan to you of S50,000?

	Page 7	i.4	
1	D. Halio	1	D. Halio
2	 The check says loan. 	2	account?
3	Q. Do you dispute it?	3	A. I don't recall.
4	A. No.	4	Q. Look at the back of the check.
5	Q. Turn to the next check dated	5	A. Then the answer's yes.
6	10 Number 1069 in the amount of \$20,000,	6	Q. You did deposit it in your
7	dated March 2nd, 2013, payable to David	7	account?
8	Halio. Did you receive this check?	8	A. It was deposited.
9	A. Yes.	9	Q. Yes. What was this check for?
10	Q. Did you deposit it in your	10	A. I don't recall.
11	account?	11	Q. Well, see where it says on the
12	A. I don't recall.	12	memo part, is that your mother's
13	 Do you have any reason to 	13	handwriting?
14	question whether you deposited it in your	14	A. Yes, it is.
15	account?	15	Q. You would recognize your
16	A. No.	16	mother's handwriting?
17	Q. Do you see where it says loan?	17	A. Yes, I will do.
18	A. Yes.	18	Q. What does it say?
19	Q. Was this a loan to you of	19	A. I can't read it.
20	\$20,000?	20	Q. Does it say: Repayment,
21	A. Yes.	21	parentheses, IRS insurance loan?
22	Q. Did you repay it?	22	A. It's illegible to me.
23	A. No.	23	Q. You can't tell?
24	Q. Did you repay the \$50,000 loan	24	A. I see it says IRS loan.
25	that's Check Number 1081?	25	Q. Well, is that what it's for?
	Page 7	5	Page 77
I	D. Halio	5	D. Halio
2	D. Halio A. No.		D. Halio A. I don't recall.
2	D. Halio A. No. Q. Turn to the next check, 1075.	1	D. Halio A. I don't recall. Q. You don't know what this check
2 3 4	D. Halio A. No. Q. Turn to the next check, 1075, the next page dated April 13th, 2013, in	1 2 3 4	D. Halio A. I don't recall.
2 3 4 5	D. Halio A. No. Q. Turn to the next check, 1075, the next page dated April 13th, 2013, in the amount of \$10,000 payable to David	1 2 3	D. Halio A. I don't recall. Q. You don't know what this check
2 3 4 5 6	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check?	1 2 3 4	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of
2 3 4 5 6 7	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes.	1 2 3 4 5 6 7	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know.
2 3 4 5 6 7 8	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature?	1 2 3 4 5 6 7 8	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall.
2 3 4 5 6 7 8 9	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes.	1 2 3 4 5 6 7 8 9	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which
2 3 4 5 6 7 8 9	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your	1 2 3 4 5 6 7 8 9	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan?
2 3 4 5 6 7 8 9 10	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account?	1 2 3 4 5 6 7 8 9 10	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't
2 3 4 5 6 7 8 9 10 11 12	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall.	1 2 3 4 5 6 7 8 9 10 11	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode.
2 3 4 5 6 7 8 9 10 11 12 13	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan?	1 2 3 4 5 6 7 8 9 10 11 12 13	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your
2 3 4 5 6 7 8 9 10 11 12 13	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13 14	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes. Q. Did you repay it?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years. Q. I'm talking about this specific
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes. Q. Did you repay it? A. No.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years. Q. I'm talking about this specific check.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes. Q. Did you repay it? A. No. Q. Turn to the next page. Check	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years. Q. I'm talking about this specific check. A. I don't remember.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes. Q. Did you repay it? A. No. Q. Turn to the next page. Check Number 1242 is on the Barbara Halio	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years. Q. I'm talking about this specific check. A. I don't remember. Q. How did you repay her?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes. Q. Did you repay it? A. No. Q. Turn to the next page. Check Number 1242 is on the Barbara Halio account, payable to David Halio, MD, in the	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years. Q. I'm talking about this specific check. A. I don't remember. Q. How did you repay her? A. How did I repay her?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes. Q. Did you repay it? A. No. Q. Turn to the next page. Check Number 1242 is on the Barbara Halio account, payable to David Halio, MD, in the amount of \$30.000, dated April 25th, 2020.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years. Q. I'm talking about this specific check. A. I don't remember. Q. How did you repay her? A. How did I repay her? Q. Well, when you repaid her, what
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	D. Halio A. No. Q. Turn to the next check, 1075. the next page dated April 13th, 2013, in the amount of \$10,000 payable to David Halio. Did you receive this check? A. Yes. Q. Is that your signature? A. Yes. Q. Did you deposit it in your account? A. I don't recall. Q. You see it says loan? A. Yes. Q. This was a loan? A. Yes. Q. Did you repay it? A. No. Q. Turn to the next page. Check Number 1242 is on the Barbara Halio account, payable to David Halio, MD, in the amount of \$30.000, dated April 25th, 2020. Did you receive this check?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	D. Halio A. I don't recall. Q. You don't know what this check was for? A. I don't know. Q. It wasn't for the repayment of IRS insurance loan? A. I don't recall. Q. Was there an episode in which you lent your mother money to repay a loan? A. I repaid my mother, but I don't recall the episode. Q. You repaid this amount to your mother? A. I repaid my mother over all of these years. Q. I'm talking about this specific check. A. I don't remember. Q. How did you repay her? A. How did I repay her? Q. Well, when you repaid her, what do you mean?
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20 (Pages 74 - 77)

	Page 10	2	Para state
1	D. Halio	1	D. Halio
2	Q. Do you see about five lines	2	the question and ignore the
3	from the end of paragraph 6 where your	3	objection. I understand the problem.
4	mother says that she was the executor of	4	Q. What type of expenses would you
5	Kitty Buck's estate? Do you know if that's	5	help your mother with?
6	correct?	6	MR. WEISS: I'm going to make
7	A. I see where it says, yes.	7	an objection and ask for a proffer,
8	Q. And do you see the last line of	8	what it has to do with this case.
9	paragraph 6 where it says: Robert's	9	MR. BRECHER: The case is about
10	sister, Ottilie, was entitled to a share of	10	Barbara Halio claiming that she
11	the holdback and she was paid from it?	11	needed to take the money from Jobar
12	A. Yes, sir.	12	because she had no other way of
13	Q. Do you know if that's correct?	13	supporting herself. The witness has
14	A. That's correct.	14	testified that he helped her, so it's
15	Q. Did someone tell you that? How	15	relevant in that regard.
16	do you know that?	16	MR. WEISS: I will withdraw my
17	 A. Because, like I said before, I 	17	objection to a certain extent, and
18	wasn't following the goings on of Jobar,	18	then I'll let you know
19	but that is correct.	19	MR. BRECHER: I'm not going to
20	Q. Did you ever speak to Ottilie	20	go too far into this. I just want to
21	about money that she received?	21	have an understanding of what he
22	 I never discussed anything 	22	helped her with.
23	about money with Ottilie.	23	MR. WEISS: Okay.
24	Q. In paragraph 8, your mother	24	Q. What type of expense were you
25	says that her sole source of income is	25	helping your mother with?
	Page 103	3	Page 105
1	D. Halio		1 age 103
		1	D. Halio
2	Social Security and money that my children	2	D. Halio A. I don't recall.
2	Social Security and money that my children give me to pay for my expenses.	2	D. Halio A. I don't recall. Q. Was it every year?
2 3 4	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay	2 3 4	D. Halio A. I don't recall. Q. Was it every year? A. Not every year.
2 3 4 5	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay for her expenses?	2 3 4 5	D. Halio A. I don't recall. Q. Was it every year? A. Not every year. Q. Was it the majority of the
2 3 4 5 6	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay for her expenses? A. I help her.	2 3 4	D. Halio A. I don't recall. Q. Was it every year? A. Not every year.
2 3 4 5 6 7	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay for her expenses? A. I help her. Q. In what size amount have you	2 3 4 5 6 7	D. Halio A. I don't recall. Q. Was it every year? A. Not every year. Q. Was it the majority of the
2 3 4 5 6 7 8	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay for her expenses? A. I help her. Q. In what size amount have you given her this year?	2 3 4 5 6 7 8	D. Halio A. I don't recall. Q. Was it every year? A. Not every year. Q. Was it the majority of the years from 2006 to 2021? A. I don't recall. Q. There's a bank borrowing
2 3 4 5 6 7 8 9	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay for her expenses? A. I help her. Q. In what size amount have you given her this year? A. I don't recall.	2 3 4 5 6 7 8 9	D. Halio A. I don't recall. Q. Was it every year? A. Not every year. Q. Was it the majority of the years from 2006 to 2021? A. I don't recall. Q. There's a bank borrowing against the Foxhurst home, correct?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay for her expenses? A. I help her. Q. In what size amount have you given her this year? A. I don't recall. Q. Last year? A. I don't recall. Q. You don't recall. The same answer would the answer be the same for the years 2007 through 2021? A. I don't recall every year. I didn't help her every year. Q. You didn't help her every year? A. No. Q. When did you help her? MR. WEISS: Hold on. MR. BRECHER: No. I'm talking about MR. WEISS: Hold on.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	D. Halio A. I don't recall. Q. Was it every year? A. Not every year. Q. Was it the majority of the years from 2006 to 2021? A. I don't recall. Q. There's a bank borrowing against the Foxhurst home, correct? A. I don't know that. Q. You don't know that Chase has a mortgage on the property? A. I know my mother pays the mortgage because she had a home equity loan to keep the business called Cape Masters afloat all of these years. It was all coming from her to keep the business afloat. Every month she had to pay Washington Mutual a certain amount of money, because if you know the history of the business MR. WEISS: Just answer his question.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Social Security and money that my children give me to pay for my expenses. Do you give her money to pay for her expenses? A. I help her. Q. In what size amount have you given her this year? A. I don't recall. Q. Last year? A. I don't recall. Q. You don't recall. The same answer would the answer be the same for the years 2007 through 2021? A. I don't recall every year. I didn't help her every year. Q. You didn't help her every year? A. No. Q. When did you help her? MR. WEISS: Hold on. MR. BRECHER: No. I'm talking about MR. WEISS: Hold on.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	D. Halio A. I don't recall. Q. Was it every year? A. Not every year. Q. Was it the majority of the years from 2006 to 2021? A. I don't recall. Q. There's a bank borrowing against the Foxhurst home, correct? A. I don't know that. Q. You don't know that Chase has a mortgage on the property? A. I know my mother pays the mortgage because she had a home equity loan to keep the business called Cape Masters afloat all of these years. It was all coming from her to keep the business afloat. Every month she had to pay Washington Mutual a certain amount of money, because if you know the history of the business MR. WEISS: Just answer his question.

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